



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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April 16, 2001

Ref: 8EPR-EP

LaVerne Steah, Project Manager
Bureau of Land Management
P.O. Box 45155
Salt Lake City, Utah 84145-0155

RE: Williams, Questar, & Kern River Pipeline
Projects Draft Environmental Impact
Statement (CEQ# 010047)

Dear Ms. Steah:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et seq., and Section 309 of the Clean Air Act, the Region 8 office of the Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) for the Williams, Questar, & Kern River Pipeline Projects. This letter transmits our rating on the preferred alternative.

The DEIS analyzes ROW corridors for three pipelines, including two natural gas pipelines (Questar and Kern River) and one refined petroleum products pipeline (Williams). The DEIS did not present alternatives such as rail or trucks to transport gas or petroleum products. The DEIS does present different alternatives for pipeline right of ways (ROW) based on different routes which start and end in the same places.

Williams proposes to convert an existing pipeline from transporting natural gas liquids to petroleum products. This would require additional pump stations.

Questar proposes to transport gas from the Price Coal Bed Methane fields and from the Colorado Interstate Gas pipeline in the Uinta Basin to local markets in Payson and other markets in the Wasatch Front, and connect to an existing Kern River pipeline that would deliver gas to Nevada and California.

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Kern River proposes to transport gas from the Price Coal Bed Methane fields to markets in the Wasatch Front and connect to the existing Kern River pipeline that would deliver gas to Nevada and California. Information presented in the DEIS generally indicates that the Questar and Kern River pipelines start and end in similar places.

Generally, the Williams proposal to convert the existing pipeline would have few impacts on natural resources other than construction of additional pump stations and the additional emissions related to new emission sources. Questar and Kern River propose to expand existing pipeline corridors and construct new natural gas pipelines. The Kern River pipeline proposal uses the same corridor as the Williams proposal until the ROW reaches Nephi on the west side of the Wasatch Mountains. From Nephi the proposed Kern River pipeline continues west to the existing Kern River pipeline. The Questar proposal deviates from that corridor near the town of Indianola and takes a different route across the Wasatch Mountains to ultimately connect to the existing Kern River pipeline.

Review and Rating of the Preferred Alternative

It is EPA policy to provide a general rating specifically on the Preferred Alternative and individually rate all alternatives if necessary. The Preferred Alternative or Alternative 1 receives a rating of EO-2 (environmental objections, insufficient information). A full description of EPA's EIS rating system is enclosed. Our rating of EO-2 is based on the lack of the range of alternatives analyzed and additional impacts to roadless areas in the Uinta National Forest. Comments on the DEIS are attached. Our main issues concern the lack of the range of alternatives, new construction activity in the Uinta NF roadless area, potential air impacts to Arches National Park and lack of consideration of connected actions.

EPA is encouraged by the analysis and the attempts to reduce environmental impacts by locating pipelines in existing ROW corridors. It appears that attempts to avoid landslide areas and headwaters for sources of drinking water have also been considered and as a result minor ROW

changes have been requested that would impinge on the boundaries of roadless areas in the Manti-La Sal and Uinta NF. In addition, directional drilling methods will reduce impacts to wetlands and aquatic life in streams and rivers.

If you have questions concerning our comments please contact Gregory Oberley of my staff, he can be reached at (303) 312-7043.

Sincerely, 

Cynthia Cody, Chief
NEPA Unit
Ecosystems Protection Program

Enclosures

DEIS Comments
EPA Rating System for DEISs

cc: Elaine Zieroth, Forest Supervisor
Manti-La Sal NF
Pete Karp, Forest Supervisor
Uinta NF
Diana Whittington, USFWS

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DEIS General Comments

Range of Alternatives

The DEIS does not present a full range of alternatives as defined in 40 CFR §1502.14 (a). The DEIS proposes two separate gas pipelines, the Questar and Kern River projects, that begin and end essentially the same places. Using the information presented in the DEIS, a joint effort on the part of these two parties to construct and operate a single larger pipeline could reduce the total miles of pipeline and the associated impacts. BLM needs to evaluate alternatives even though they are not within the jurisdiction of the agency {40 CFR§1502 (c)}. BLM must also consider all reasonable alternatives that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant (CEQ 40 Questions #2a and 2b).

The volumes of gas transported by two pipelines (one 24 inch and one 20 inch) could potentially be transported by a single 30 inch pipeline with much less impact. According to information supplied in the DEIS pipeline spills and accidents are related to miles of pipeline. Replacing the two proposed gas pipelines with a single pipeline would provide a significant reduction in anticipated spills and accidents with injuries and deaths. In addition, significant reductions in temporary impacts to wetlands and riparian habitat could also be avoided by using one larger pipeline to transport the same volume of gas to the same markets. It is likely that installation and operating costs could also be reduced ultimately making the project more economical which would achieve a lower cost per unit of gas for the markets served by the pipeline.

Because the two gas pipelines serves essentially the same markets (excluding Payson) and because they essentially start in the same area, a full analysis of a consolidated pipeline is required by CEQ regulations and guidance. EPA requests that the DEIS be revised to incorporate this alternative.

Uinta National Forest Roadless Area

EPA also has objections to widening the existing ROW for the Questar proposed route through the Uinta National Forest (NF) roadless area east of the Blackhawk campground. The DEIS is vague concerning the access to the existing ROW through this Uinta NF roadless area. It is difficult to determine from the information in the DEIS if service road access is already provided or if a new access road would need to be established.

BLM needs to provide additional information on the types of vegetation and the species habitat that would be impacted by the ROW through the Uinta NF roadless area. Environmental impacts need to be evaluated beyond the foot print of the surface disturbance. BLM must provide the decision maker with information that identifies if the type of vegetation and habitat being impacted is unique, rare or commonly found to exist in the area. Losing a small amount of critical habitat is more significant than losing the same acreage of habitat that is more common to the area and this information needs to be provided before a decision on the pipeline ROW route is granted.

Information needs to be provided concerning the effectiveness of gating pipeline service access roads on public property. In some areas providing gated access to service roads may be effective but in areas with high usage of all terrain vehicles (ATVs) or motorcycles, gates may not be an effective deterrent. The Uinta NF west of Blackhawk campground is identified as an area that currently receives heavy recreation use. If service access roads are improved in this area, it should be anticipated that recreational use will increase. BLM needs to provide information that anticipates and analyzes the potential impact of new or improved access roads in the Uinta and Manti-La Sal NF. In addition, surface disturbance from pipeline construction in this area may also be difficult to repair if recreational traffic continues to interrupt restoration attempts. Cumulative impacts from recreation and pipeline construction may reduce the effectiveness of restoration efforts. As a result, restoration areas may require closure to ATV usage until re-vegetation is successful.

EPA encourages BLM to reconsider the Questar Southern Alternative in lieu of the route that bifurcates the Uinta NF roadless area. Vegetation disturbance with increased access between the Golden Ridge and Birdseye roadless areas west of the Blackhawk campground could be entirely avoided by reconsidering and selecting the Southern Alternative.

Air Impacts

BLM needs to supply additional information that would analyze air impacts from proposed and existing pumping stations. Especially critical are the pump stations near National Parks in the Moab area. It appears that from Figure 3-1, a new pump station is proposed to be located very near Arches National Monument. The DEIS should anticipate emissions from this station and determine any loss of increment in air quality for Arches National Park.

Connected Actions

The DEIS needs to analyze additional connected actions that would include impacts related to the Equilon pipeline that terminates near Bloomfield, New Mexico. The DEIS points out that the Equilon pipeline project which is also proposing to convert an existing pipeline to petroleum products could supply the Williams pipeline. EPA was informed by BLM and public individuals that these two "separate projects" were once proposed as one project. BLM then made a determination that the entire project would require a single EIS. Shortly thereafter, Equilon in a letter to BLM withdrew their proposal and backed out of the joint venture. CEQ regulations in (40 CFR §1508.25) determines actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification. BLM and Williams have not provided any information in the DEIS such as information on supply contracts that would support the argument that the two pipelines are not connected. The only information that has been documented is that at one time the two companies had entered a partnership to transport petroleum products from the Texas gulf coast to Salt Lake City, Utah. No new documentation has been provided in the DEIS that contradicts that information.

**Environmental Protection Agency Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO -- Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO -- Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.